

*Electronically Filed
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13 **UNITED STATES BANKRUPTCY COURT**

14 **DISTRICT OF NEVADA**

15 In re:)	CASE NO. BK-09-14814-LBR
)	(Jointly Administered)
16 THE RHODES COMPANIES, LLC, aka)	
17 "Rhodes Homes," et al., ¹)	Chapter 11
)	
18 Reorganized Debtors.)	Hearing Date: June 21, 2010 (Requested)
)	Hearing Time: 9:30 A.M.

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22 ¹ The Reorganized Debtors in these cases, along with their case numbers are: Heritage Land Company, LLC (Case No. 09-14778); The Rhodes Companies, LLC (Case No. 09-14814); Tribes Holdings, LLC (Case No. 09-14817); Apache Framing, LLC (Case No. 09-14818); Geronimo Plumbing LLC (Case No. 09-14820); Gung-Ho Concrete LLC (Case No. 09-14822); Bravo, Inc. (Case No. 09-14825); Elkhorn Partners, A Nevada Limited Partnership (Case No. 09-14828); Six Feathers Holdings, LLC (Case No. 09-14833); Elkhorn Investments, Inc. (Case No. 09-14837); Jarupa, LLC (Case No. 09-14839); Rhodes Realty, Inc. (Case No. 09-14841); C & J Holdings, Inc. (Case No. 09-14843); Rhodes Ranch General Partnership (Case No. 09-14844); Rhodes Design and Development Corporation (Case No. 09-14846); Parcel 20, LLC (Case No. 09-14848); Tuscany Acquisitions IV, LLC (Case No. 09-14849); Tuscany Acquisitions III, LLC (Case No. 09-14850); Tuscany Acquisitions II, LLC (Case No. 09-14852); Tuscany Acquisitions, LLC (Case No. 09-14853); Rhodes Ranch Golf Country Club, LLC (Case No. 09-14854); Overflow, LP (Case No. 09-14856); Wallboard, LP (Case No. 09-14858); Jackknife, LP (Case No. 09-14860); Batcave, LP (Case No. 09-14861); Chalkline, LP (Case No. 09-14862); Glynda, LP (Case No. 09-14865); Tick, LP (Case No. 09-14866); Rhodes Arizona Properties, LLC (Case No. 09-14868); Rhodes Homes Arizona, L.L.C. (Case No. 09-14882); Tuscany Golf Country Club, LLC (Case No. 09-14884); and Pinnacle Grading, LLC (Case No. 09-14887).

Affects:

☒ All Debtors
☐ The Following Debtor(s):

**EX-PARTE MOTION FOR ORDER
 SHORTENING TIME RE:
 REORGANIZED DEBTORS'
 OBJECTION TO JAMES RHODES'
 PROOF OF CLAIM NO. 814-33 AND
 NOTICE OF AMENDMENT OF
 SCHEDULES OF ASSETS AND
 LIABILITIES**

The Reorganized Debtors, by and through their counsel, Kolesar & Leatham, Chtd., and Akin Gump Strauss Hauer & Feld LLP, hereby move this Court, ex-parte, for an Order Shortening Time to hear their Objection to James Rhodes' Proof of Claim No. 814-33 and Notice of Amendment of Schedules of Assets and Liabilities (the "Objection") in the above-captioned cases.

This motion is based upon the attached points and authorities, the papers and pleadings on file herein and the attached Affidavit of Nile Leatham, Esq.

Dated this 27th day of May, 2010.

By: 

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MEMORANDUM OF POINTS AND AUTHORITIES

STATEMENT OF FACTS

Federal Rule of Bankruptcy Procedure 3007(a) provides that, for objections to the allowance of claims, a 30-day notice is required. Federal Rule of Bankruptcy Procedure 9006(c) provides that the court may, "for cause shown," shorten the time for providing notice of a motion. Local Rule LR 9006 implements this provision stating:

- (a) In appropriate circumstances and for good cause shown, the court may shorten the time for a notice of intended action, or for serving a motion and holding the hearing thereon.

Local Rule 9006(b) specifies that such a motion shall be accompanied by an affidavit explaining why an expedited hearing is required and an attorney information sheet indicating whether opposing counsel objects to the hearing on shortened time.

Attached hereto is the Affidavit of Nile Leatham, Esq., indicating why a hearing is required as soon as possible. Movants, therefore, request that the Court set for hearing the Objection to be heard at the last omnibus hearing date of June 21, 2010. Movants further request that the deadline for filing responses to the Objection be set for June 14, 2010 at 5:00 p.m. (Pacific Time).

Dated this 27th day of May, 2010.

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